

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

MATTHEW SAWYER KRAFT

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 922(g)(1),
922(g)(3), 924(a)(2), 924(d)(1), 922(l), and
924(a)(1)(C); and 26 U.S.C. §§ 5822, 5841,
5861(c), 5861(d), 5871, and 5872; and 28
U.S.C. § 2461(c)

COUNT ONE

Possession of Firearms by a Convicted Felon

The Grand Jury Charges:

On or about June 28, 2021, in the District of North Dakota,

MATTHEW SAWYER KRAFT,

knowing that he had previously been convicted in any court of one or more of the
following crimes punishable by imprisonment for a term exceeding one year, to wit:

Possession of a Controlled Substance – Heroin – with a Firearm; Possession of a
Controlled Substance – Methamphetamine – with a Firearm; Possession of a Controlled
Substance – Schedule I Hallucinogenic – with a Firearm, in violation of North Dakota
Century Code § 19-03.1-23(8)(a), a crime punishable by a fine and not more than five
years imprisonment, State of North Dakota, Cass County, District Court, Case Number
09-2018-CR-05056, Judgment entered on or about March 18, 2019, did knowingly
possess firearms, specifically:

- a Ruger, Model AR-556, 5.56 caliber firearm, Serial Number 853-41894;

- an Intratec, Model AB10, 9mm caliber pistol, Serial Number A036685;
- a Maxflo NG2 Defender, Model MF3D223, .223 caliber firearm silencer, Serial Number MF3D100049;
- a Grand Power S.R.O., Model Stribog SP9A1, 9mm caliber rifle, Serial Number GBA4800;
- an Intratec, Model AB10, 9mm caliber pistol, Serial Number 126523;
- a Glock, Model 43, 9mm caliber pistol, Serial Number BDRG029;
- a Taurus International, Model G2C, 9mm caliber pistol, Serial Number TLP02613;

said firearms having been shipped and transported in interstate commerce;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWO

Possession of Firearms by a Prohibited Person

The Grand Jury Further Charges:

On or about June 28, 2021, in the District of North Dakota,

MATTHEW SAWYER KRAFT,

knowing that he was an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, and knowing that he was addicted to a controlled substance as defined in Title 21, United States Code, Section 802, did knowingly possess firearms, specifically:

- a Ruger, Model AR-556, 5.56 caliber firearm, Serial Number 853-41894;
- an Intratec, Model AB10, 9mm caliber pistol, Serial Number A036685;
- a Maxflo NG2 Defender, Model MF3D223, .223 caliber firearm silencer, Serial Number MF3D100049;
- a Grand Power S.R.O., Model Stribog SP9A1, 9mm caliber rifle, Serial Number GBA4800;
- an Intratec, Model AB10, 9mm caliber pistol, Serial Number 126523;
- a Glock, Model 43, 9mm caliber pistol, Serial Number BDRG029;
- a Taurus International, Model G2C, 9mm caliber pistol, Serial Number TLP02613;

said firearms having been shipped and transported in interstate commerce;

In violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT THREE

Receipt or Possession of Firearms Made in Violation of NFA

The Grand Jury Further Charges:

On or about June 28, 2021, in the District of North Dakota,

MATTHEW SAWYER KRAFT

knowingly received and possessed firearms, specifically:

- a Juggernaut Tactical JT-15 lower receiver, manufactured into a firearm with no serial number, with an overall length of approximately 25.5 inches and a barrel with an approximate length of 11 inches, a rifle having a barrel of less than 16 inches in length;
- an unknown manufacturer lower receiver, manufactured into a firearm with no serial number, with an overall length of approximately 29 inches and a barrel with an approximate length of 10 inches, a rifle having a barrel of less than 16 inches in length;
- a Grand Power S.R.O., Model Stribog SP9A1, 9mm caliber rifle, Serial Number: GBA4800, with an overall length of approximately 31.5 inches and with a barrel with an approximate length of 8 inches, a rifle having a barrel of less than 16 inches in length; and
- 14 miscellaneous firearm silencers with no known manufacturer and no serial numbers;

made in violation of Chapter 53 of Title 26;

In violation of Title 26, United States Code, Sections 5822, 5861(c), and 5871.

COUNT FOUR

Receipt or Possession of Unregistered Firearm

The Grand Jury Further Charges:

On or about June 28, 2021, in the District of North Dakota,

MATTHEW SAWYER KRAFT

knowingly received and possessed a firearm, specifically:

- a Maxflo NG2 Defender, Model MF3D223, .223 caliber firearm silencer, Serial Number MF3D100049,

not registered to him in the National Firearms Registration and Transfer Record;

In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT FIVE

Illegal Importation of Firearms

The Grand Jury Further Charges:

In or about May through June, 2021, in the District of North Dakota,

MATTHEW SAWYER KRAFT,

knowingly and without authorization by the Attorney General as provided in Title 18, United States Code, Section 925(d), imported and brought into the United States, firearms, specifically:

- 6 miscellaneous firearm silencers with no known manufacturer and no serial numbers;

In violation of Title 18, United States Code, Section 922(1) and 924(a)(1)(C).

FORFEITURE ALLEGATION – ONE
UNDER 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)
(Possession of Firearms by a Convicted Felon)
(Possession of Firearms by a Prohibited Person)
(Illegal Importation of Firearms)

The Grand Jury Further Finds Probable Cause That:

Upon conviction of the offenses alleged in Counts One, Two, and Five of this Indictment,

MATTHEW SAWYER KRAFT

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), all firearms involved in the commission of the offense, including, but not limited to, the following:

- a Ruger, Model AR-556, 5.56 caliber firearm, Serial Number 853-41894;
- an Intratec, Model AB10, 9mm caliber pistol, Serial Number: A036685;
- a Maxflo NG2 Defender, Model MF3D223, .223 caliber firearm silencer, Serial Number MF3D100049;
- a Grand Power S.R.O., Model Stribog SP9A1, 9mm caliber rifle, Serial Number GBA4800;
- an Intratec, Model AB10, 9mm caliber pistol, Serial Number 126523;
- a Glock, Model 43, 9mm caliber pistol, Serial Number: BDRG029;
- a Taurus International, Model G2C, 9mm caliber pistol, Serial Number TLP02613;
- 6 miscellaneous firearm silencers with no known manufacturer and no serial numbers.

FORFEITURE ALLEGATION – TWO

UNDER 26 U.S.C. § 5872

(Receipt or Possession of Firearms Made in Violation of NFA)

(Receipt or Possession of Unregistered Firearm)

The Grand Jury Further Finds Probable Cause That:

Upon conviction of one or both of the offenses alleged in Counts Three and Four of this Indictment,

MATTHEW SAWYER KRAFT

shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872, all firearms involved in the commission of the offenses, including, but not limited to, the following:

- a Maxflo NG2 Defender, Model MF3D223, .223 caliber firearm silencer, Serial Number MF3D100049;
- a Juggernaut Tactical JT-15 lower receiver, manufactured into a firearm with no serial number, with an overall length of approximately 25.5 inches and a barrel with an approximate length of 11 inches;
- an unknown manufacturer lower receiver, manufactured into a firearm with no serial number, with an overall length of approximately 29 inches and a barrel with an approximate length of 10 inches;
- a Grand Power S.R.O., Model Stribog SP9A1, 9mm caliber rifle, Serial Number GBA4800, with an overall length of approximately 31.5 inches and with a barrel with an approximate length of 8 inches; and

- 14 miscellaneous firearm silencers with no known manufacturer and no serial numbers.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Nicholas W. Chase

NICHOLAS W. CHASE

Acting United States Attorney

RML/ljc